

## **U.S. Department of Justice**

United States Attorney Southern District of New York

86 Chambers Street, 3rd floor New York, New York 10007

January 11, 2021

## By ECF

Honorable Sarah Netburn United States Magistrate Judge United States Courthouse 40 Foley Square New York, NY 10007

Re: In re Terrorist Attacks, 03 MDL 1570 (GBD) (SN)

## Dear Judge Netburn:

We write jointly on behalf of the Federal Bureau of Investigation ("FBI") and the Plaintiffs' Executive Committees ("PECs") to respectfully request a one-day extension of the deadline for submitting a joint letter outlining disputes concerning the redactions in one of the documents related to the motion papers concerning the Alzamari deposition. The parties have been working vigorously and collaboratively in finalizing the voluminous motion papers for public filing. Through numerous meet-and-confers, the parties have successfully resolved almost all disputes related to proposed redactions, subject to the PECs' standing objection, and the filing parties have filed redacted versions of all but one of those documents on the ECF system (except for those documents which the parties have agreed, subject to the PECs' standing objection, should remain under seal in their entirety under the FBI Protective Order).

Although the parties had expected to reach resolution on all outstanding issues, in the course of preparing the documents for filing this evening the FBI and the PECs realized that there remained an area of dispute with respect to information contained in two paragraphs of the September 9, 2020 joint letter. The parties discussed this dispute late into the evening, but our efforts to resolve this issue were complicated by the fact that the final redacted version of the July 2, 2020 order (ECF No. 6322), to which the letter pertains, was not on the public docket. The FBI and the PECs will provide a letter to the Court addressing the parties' respective positions with respect to the disputed language in this document by tomorrow, January 12.

We apologize for this request, and are aware that the Court, in its order of January 5, 2021, granting a prior extension request (ECF No. 6569), stated that the Court did not anticipate granting further extensions of this deadline.

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Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney for the
Southern District of New York

By: /s/ Jeannette Vargas

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cc: Counsel for Plaintiffs' Executive Committees Counsel for the Kingdom of Saudi Arabia Counsel for Dallah Avco Counsel for Akram Alzamari